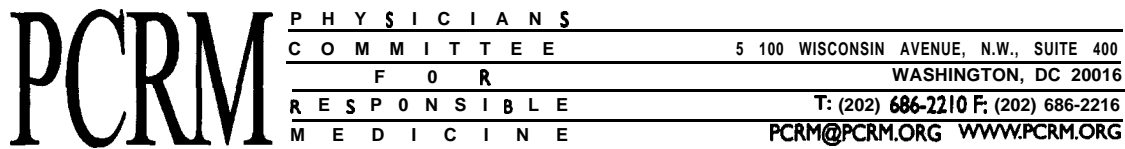


201-16281



June 8, 2006

Mr. Stephen Johnson, Administrator
U.S. Environmental Protection Agency
Ariel Rios Building, 1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Public comments on the HPV Test Plan for Stilbene fluorescent brighteners intermediates

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Dear Administrator Johnson:

The following comments on ETAD's test plan for the chemical category, Stilbene fluorescent brighteners intermediates, are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

ETAD North America's Stilbene Fluorescent Brighteners consortium submitted its test plan on December 21, 2005 for the category Stilbene fluorescent brighteners intermediates, consisting of (CAS No. 888 1-118), salt (CAS No. 7336-20-1) and salt (CAS No. 3709-43-1)), as well as one supporting chemical, 2,2'-Stilbenedisulfonic acid, 4,4'-dinitro, dipotassium salt (CAS No. 78447-91-3). Although the chemicals in this category are not site limited, they are all intermediates manufactured in closed systems and undergo full chemical conversion to fluorescent whitening agents and dyes. The consortium submitted a comprehensive analysis of Stilbene fluorescent brighteners intermediates by compiling data from a variety of sources. In addition, the sponsor combined three chemicals with similar physical, chemical, and toxicity profiles into a single category for purposes of the HPV program. This is a scientifically valid analysis for a screening level program such as HPV and we concur with ETAD that no additional testing is necessary.

Existing data on some members of the category, as well as data from the surrogate chemical, were used in a read-across approach to fill all SIDS endpoints for physicochemical properties, environmental fate, and human and environmental effects of Stilbene fluorescent brighteners intermediates. ETAD submitted a well-written, thorough test plan for this category of chemical with no additional testing proposed under the HPV

program. Thank you for your attention to these comments. I may be reached at 202-686-22 10, ext. 327, or via e-mail at *meven@pcrm.org*.

Sincerely,

Megha Even, M.S.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Toxicology and Research